

OGC HAS REVIEWED.

Approved For Release 2001/09/01 : CIA-RDP81-00314R000600010010-9

7-3646
21 NOV 1977

STATINTL

MEMORANDUM FOR: [REDACTED]
Office of Legislative Counsel

FROM : F. W. M. Janney
Director of Personnel

SUBJECT : Senate and House Bills Relative to Financial
Disclosures for Federal Employees' Integrity
and Post-Employment Restrictions

1. (U/AIUO) In response to your informal note of 14 November 1977, we have reviewed the particular provisions of S. 555, H.R. 1, and H.R. 6954 which provide for restrictions on post-employment activities of certain Federal employees. While the new caveats are more extensive than current restrictions and appear to be very specific, we see nothing which would impose conflicts peculiar to the concerns of the Agency, such as security of operations.

2. (C) We do have problems with Section 304 of S. 555 which provides that the President may exempt an individual of the Central Intelligence Agency, among others, from filing a financial disclosure report with the supervising ethics office, permitting filing with the head of the agency. Would this provision be interpreted as

STATINTL

(S) F. W. M. Janney

F. W. M. Janney

Dist:

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OP/P&C/RS/[REDACTED]:cmc (17 Nov 77)
Retyped: OD/Pers:jmm (21 Nov 77)

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